

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LAWRENCE MALLY, Individually and on Behalf of All others Similarly Situated,)	Civil Action No. 1:07-cv-7097 (DLC)
)	
)	
Plaintiff,)	
)	
v.)	
)	
QIAO XING UNIVERSAL TELEPHONE, INC., RUI LIN WU, ALBERT LEUNG,)	
)	
)	
Defendants)	

MILTON PFEIFFER, On Behalf Of Himself And All Others Similarly Situated,)	Civil Action No. 1:07-cv-7252 (DLC)
)	
)	
Plaintiff,)	
)	
v.)	
)	
)	
QIAO XING UNIVERSAL TELEPHONE, INC., RUI LIN WU, ALBERT LEUNG,)	
)	
)	
Defendants)	

(additional captions listed on the following page)

**MOTION OF PELO a.s. TO CONSOLIDATE, TO BE APPOINTED LEAD
PLAINTIFF, AND FOR APPROVAL OF
ITS SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

ISAAC FISHMAN, Custodian for the IBF Foundation,)	Civil Action No. 1:07-cv-7312 (DLC)
)	
Plaintiff,)	
)	
v.)	
)	
QIAO XING UNIVERSAL TELEPHONE, INC., WU RUI LIN, WU ZHI-YANG, ALBERT LEUNG, SONNY KWOK WING HUNG, ZE YUN MU, YI HONG ZHANG, Grobstein Horwatht Co. LLP)	
)	
Defendants.)	

MICHAEL LOCKE, On Behalf Of Himself And All Others Similarly Situated,)	Civil Action No. 1:07-cv-7693 (DLC)
)	
Plaintiff,)	
)	
v.)	
)	
QIAO XING UNIVERSAL TELEPHONE, INC., WU RUI LIN, WU ZHI-YANG, ALBERT LEUNG, SONNY KWOK WING HUNG, ZE YUN MU, YI HONG ZHANG, Grobstein Horwatht Co. LLP)	
)	
Defendants.)	

REUVEN LAPIN, On Behalf Of Himself And All Others Similarly Situated,)	Civil Action No. 1:07-cv-7829 (DLC)
)	
Plaintiff,)	
)	
v.)	
)	
QIAO XING UNIVERSAL TELEPHONE, INC., RUI LIN WU, ALBERT LEUNG,)	
)	
Defendants.)	

PLEASE TAKE NOTICE that PELO a.s. (“Movant”) hereby moves the Court for an Order pursuant to Rule 42 of the Federal Rules of Civil Procedure, consolidating all related actions for all purposes and appointing it Lead Plaintiff. In addition, Movant moves this Court for an Order pursuant to Section 21D(a)(3)(B)(v) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B)(v), approving its selection of the law firm of Murray, Frank & Sailer LLP as Lead Counsel for the Class.

Movant makes this motion based on the complaints filed herein, the Memorandum of Law submitted contemporaneously herewith, the Declaration of Brian Murray in Support of the Movant’s Motion to Consolidate, to be Appointed Lead Plaintiff, and for Approval of Its Selection of Lead Counsel and Liaison Counsel, executed on October 9, 2007, and on all other pleadings, motions, and orders in this action.

Dated: October 9, 2007
New York, New York

MURRAY, FRANK & SAILER LLP

By: _____/s/_____
Brian P. Murray (BM- 9954)
275 Madison Avenue, 8th Floor
New York, NY 10016
Telephone: (212) 682-1818
Facsimile: (212) 682-1892

Proposed Lead Counsel for the Class

CERTIFICATE OF SERVICE

The undersigned hereby certifies, under penalty of perjury, that a true and correct copy of the above and foregoing MOTION OF PELO A.S. TO CONSOLIDATE, TO BE APPOINTED LEAD PLAINTIFF, AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL was served by electronic filing to registered users in this action, and by regular United States mail, postage prepaid, this 9th day of October, 2007, to the following:

Plaintiffs' Counsel

Frederick S. Fox, Esq. Kaplan, Kaplan, Fox & Kilsheimer LLP 850 Third Avenue 14th Floor New York, NY 10022 Tel: (212) 687-1980 Fax: (212) 687-7714	Marc I Gross, Esq. Pomerantz Haudek Block Grossman & Gross LLP 100 Park Avenue, 26th Floor New York, NY 10017 Tel: (212)661-1100 Fax: (212) 661-8665
Gregory M. Nespole , Esq. Wolf Haldenstein Adler Freeman & Herz LLP 270 Madison Avenue New York, NY 10017 Tel: (212) 545-4600 Fax: (212) 545-4693	Evan J Smith, Esq. Brodsky & Smith, L.L.C. 240 Mineola Blvd. Mineola, NY 11501 Tel: (516) 741-4977 Fax: (516) 741-0626
Jacob T. Fogel, Esq. Law Office of Jacob T. Fogel, P.C. 32 Court Street Suite 602 Brooklyn, NY 11201	Richard Maniskas, Esq. Schiffrin & Barroway LLP 280 King of Prussia Road Radnor, PA 19087 Tel: (610) 667.7706 Fax: (610) 667.7056

Defendants and or Defendants' Counsel

<p>Jack C. Auspitz, Esq. Morrison & Foerster LLP 1290 Avenue of the Americas New York, NY 10104 Tel: (212) 468-8046 Fax: (212) 468-7900</p> <p>Counsel for Qiao Xing Universal Telephone, Inc. and Albert Leung, Sonny Kwok Wing Hung, Wu Rui Lin, Wu Zhi-Yang, Yi Hong Zhang, Ze Yun Mu, Rui Lin Wu, Zhi Yang Wu,</p>	<p>Grobstein, Horwath & Co. LLC 15233 Ventura Blvd. 9th Floor Sherman Oaks, CA 91403 Tel: (818) 501-5200 Fax: (818) 907-9632</p>
<p>Albert Leung c/o Qiao Xing Universal Telephone, Inc. Qiao Xing Science Indus. Park Tang Quan Huizhou City Guangdong, China 516 023</p>	

/s/

Thomas J. Kennedy